

**FILED**

**MAY 14 2025**

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
BY                      DEPUTY CLERK

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF TEXAS

SAN ANTONIO DIVISION

Don A. Hampton and Cheryl A. Hampton,

Plaintiffs,

v. Case # 5:25-CV-00341-JKP

Groupon, Inc.,

Defendant.

**PROPOSED ENTRY OF DEFAULT**

TO THE CLERK OF THE COURT:

Plaintiffs, Don A. Hampton and Cheryl A. Hampton, respectfully requests that the Clerk of this Court enter a default against Defendant, Groupon, Inc., pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, for failure to respond to the Complaint filed on March 31, 2025, and served on the Defendant on April 5, 2025.

In support of this request, Plaintiff states the following:

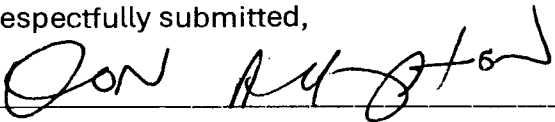
1. Plaintiffs Complaint was filed with the Court on March 31, 2025.
2. Defendant, Groupon, Inc., was properly served with the Complaint and Summons on April 5, 2025.
3. Pursuant to Rule 12(a) of the Federal Rules of Civil Procedure, the deadline for the Defendant to respond was April 23, 2025 as a private entity.
4. As of today, Defendant has not filed an answer, motion, or otherwise responded to the Complaint.
5. Defendant's failure to respond constitutes a default under Rule 55(a).

WHEREFORE, Plaintiff respectfully requests that the Clerk enter default against Defendant, Groupon, Inc.

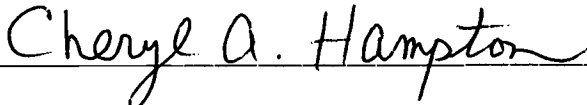
2

DATED: May 14, 2025

Respectfully submitted,

  
\_\_\_\_\_ 5/14/25

Don A. Hampton, M.A., B.S. L.M.T.

  
\_\_\_\_\_ 5/14/25

Cheryl A. Hampton, M.B.A., B.S., A.A.

314 Addax Dr.

San Antonio, TX 78213

[donhampton47@yahoo.com](mailto:donhampton47@yahoo.com)

### **CERTIFICATE OF SERVICE**

I hereby certify that on 5/14/25, a true and correct copy of this Proposed Entry of Default was served on the Defendant-Groupon, Inc., by USPS Certified Mail.

Don A. Hampton

Signature   
\_\_\_\_\_

5/14/25

### **ENTRY OF DEFAULT**

It appears from the record that Defendant-Groupon, Inc. has failed to plead or otherwise defend in this case as required by law, default is hereby entered against Defendant pursuant to Rule 55(a) of the Federal Rules of Civil Procedure.

Dated: \_\_\_\_\_

### **CLERK OF COURT**

By: \_\_\_\_\_

**Deputy Clerk**

**UNITED STATES DISTRICT COURT**  
**Western District of Texas – San Antonio Division**

**Case No.:** 5:25-CV-00341-JKP

**Judge:** Jason Pulliam

I, **Carl Ross**, declare under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am over the age of 18 and not a party to this action.
2. I am competent to make this declaration based on personal knowledge.
3. On 4/5/25, I served the following documents in the above captioned case:
  - a. Civil Complaint
  - b. Summons
  - c. Preliminary Injunction
4. The documents were served as required under Rule 4(i) of the Federal Rules of Civil Procedure, as follows to the following address:

**Groupon, Inc. Attn: Dane Drobny, General Counsel** was served on Apr 5, 2025 by USPS Priority Mail to the following address: 600 W Chicago Ave, Ste 400, Chicago, IL 60654
5. I personally served the documents at the above address, or alternatively, I mailed them to the defendant's address, as required by Rule 4 of the Federal Rules of Civil Procedure.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on this 14<sup>th</sup> day of May 2025.

Print Your Name:

CARL ROSS

Your

Address:

211 W GREENWAY AVE  
SAN ANTONIO, TEXAS 78226

Your Signature:

Carl Ross